

Kelly H. Dove, Esq. (NV Bar No. 10569)
 Jennifer B. Lustig, Esq. (NV Bar No. 9110)
 SNELL & WILMER L.L.P.
 1700 South Pavilion Center Drive, Suite 700
 Las Vegas, Nevada 89135
 Telephone: 702.784.5200
 Facsimile: 702.784.5252
 Email: kdove@swlaw.com
jlustig@swlaw.com

Attorney for Defendant Wells Fargo Bank, N.A.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JANICE DARKO,

Plaintiff,

vs.

GREEN DOT CORPORATION; WELLS
FARGO BANK, N.A.

Defendants.

Case No. 2:25-cv-00741-JCM-DJA

JOINT MOTION

**~~STIPULATION~~ TO EXTEND DEADLINE
TO RESPOND TO COMPLAINT**

[SECOND REQUEST]

THIS STIPULATION is entered into by and between Defendant Wells Fargo Bank, N.A.
 (“Wells Fargo”) and Plaintiff Janice Darko (“Darko”, and together with Wells Fargo, the “Parties”),
 by and through their respective counsel of record, to extend Wells Fargo’s deadline to respond to
 Plaintiff’s Complaint from June 5, 2025 until June 19, 2025 based on the following:

1. Plaintiff filed the Complaint on April 28, 2025.
2. Plaintiff served the Summons and Complaint on Wells Fargo on May 1, 2025.
3. Based on the date of service of the Summons and Complaint, Wells Fargo’s original
deadline to respond to the Complaint was May 22, 2025.
4. On May 20, 2025, the Parties filed a stipulation to extend the deadline for Wells
Fargo to respond to the Complaint until June 5, 2025 [ECF No. 8], which the Court granted. [ECF
No. 10.]
5. The Parties are discussing early resolution options that may resolve all claims pled
by Darko against Wells Fargo. To allow the Parties sufficient opportunity to discuss resolution
options without the need to expend resources, the Parties stipulate and agree to a further extension

Snell & Wilmer

L.L.P.
LAW OFFICES
1700 South Pavilion Center Drive, Suite 700
Las Vegas, Nevada 89135
702.784.5200

for Wells Fargo to respond to the Complaint.

NOW, THEREFORE, based on the foregoing and subject to Court approval, the Parties agree as follows:

1. The Parties stipulate and agree to extend the deadline for Wells Fargo to respond to the Complaint, up to and including **June 19, 2025**, to allow the Parties sufficient time to evaluate early resolution options.

2. This extension request is sought in good faith and is not made for the purpose of delay.

IT IS SO STIPULATED.

Dated: June 3, 2025

SNELL & WILMER L.L.P.

/s/ Jennifer B. Lustig

Kelly H. Dove, Esq.

Nevada Bar No. 10569

Jennifer B. Lustig, Esq.

Nevada Bar No. 9110

1700 South Pavilion Center Drive, Ste. 700

Las Vegas, Nevada 89135

Attorneys for Defendant Wells Fargo Bank, N.A.

Dated: June 3, 2025

LAW OFFICE OF KEVIN L. HERNANDEZ

/s/ Kevin L. Hernandez

Kevin L. Hernandez, Esq.

Nevada Bar No. 12594

8920 W. Tropicana Ave., Suite 101

Las Vegas, NV 89147

Attorneys for Plaintiff Janice Darko

ORDER

Under Local Rule 7-1(c), a stipulation that has been signed by fewer than all the parties or their attorneys will be treated - and must be filed - as a joint motion. The Court thus treats this filing as a joint motion and will expect that future filings follow Local Rule 7-1(c). The Court GRANTS the joint motion (ECF No. 14).

IT IS SO ORDERED.

Dated: 6/4/2025


UNITED STATES MAGISTRATE JUDGE

Snell & Wilmer
L.L.P.
LAW OFFICES
1700 South Pavilion Center Drive, Suite 700
Las Vegas, Nevada 89135
702.784.5200

1 Respectfully submitted by:

2 SNELL & WILMER L.L.P.

3 /s/ Jennifer B. Lustig

4 Kelly H. Dove, Esq.

5 Nevada Bar No. 10569

6 Jennifer B. Lustig, Esq.

7 Nevada Bar No. 9110

8 1700 South Pavilion Center Drive, Ste. 700

9 Las Vegas, Nevada 89135

10 *Attorneys for Defendant Wells Fargo Bank,*
11 *N.A.*

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

CERTIFICATE OF SERVICE

I hereby certify that on June 3, 2025 I electronically filed the foregoing **STIPULATION TO EXTEND DEADLINE TO RESPOND TO COMPLAINT [SECOND REQUEST]** with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED June 3, 2025.

/s/ Joanna Fung
An employee of SNELL & WILMER L.L.P